

1 John D. Fiero (CA Bar No. 136557)  
PACHULSKI STANG ZIEHL & JONES LLP  
2 One Sansome Street, 34th Floor, Suite 3430  
San Francisco, CA 94104  
3 Telephone: (415) 263-7000  
Facsimile: (415) 263-7010  
4 E-mail: jfiero@pszjlaw.com

5 *Attorneys for Michael Goldberg,*  
*Trustee of the PFI Trust*

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7 **UNITED STATES BANKRUPTCY COURT**  
8 **NORTHERN DISTRICT OF CALIFORNIA**  
9 **SAN FRANCISCO DIVISION**

10 In re  
11 PROFESSIONAL FINANCIAL  
INVESTORS, INC., *et al.*,  
12 Debtor.

Case No. 20-30604  
(Jointly Administered)  
Chapter 11

13 **STIPULATION FOR RELEASE OF**  
14 **IRREVOCABLE TRUST PROCEEDS**

15 This *Stipulation for Release of Irrevocable Trust Proceeds* (“**Stipulation**”) is entered into  
16 by and between Michael Goldberg, the duly appointed Trustee (“**Trustee**” or “**Plaintiff**”) and  
17 Charlene Albanese (“**Defendant Albanese**”) by and through the undersigned attorneys of record.

18 **RECITALS**

19 **WHEREAS** Plaintiff is the successor in interest to Professional Financial Investors and  
20 each of its affiliates in the above-captioned jointly-administered chapter 11 bankruptcy cases  
21 (collectively, the “**Debtor**”); and

22 **WHEREAS** the Debtor and Defendant Albanese are parties to that certain Second  
23 Stipulation Regarding Claims Involving Charlene Albanese, Individually and as Trustee of the  
24 Kenneth J. Casey Irrevocable Trust 2012 (the “**Irrevocable Trust Stipulation**”) filed with the  
25 Court on December 3, 2020 at Docket Number 277; and

26 **WHEREAS** Plaintiff and Defendant Albanese are among the counterparties to that certain  
27 Settlement Agreement with Mutual General Releases (the “**Settlement Agreement**”) dated June  
28 24, 2025; and

## STIPULATION

*Attorneys for Charlene Albanese*

STATE OF CALIFORNIA )  
CITY OF SAN FRANCISCO )

I, Oliver Carpio, am employed in the city and county of San Francisco, State of California. I am over the age of 18 and not a party to the within action; my business address is One Sansome Street, 34<sup>th</sup> Floor, Suite 3430, San Francisco, CA 94104-4436.

On July 1, 2025, I caused to be served the following document in the manner stated below:

• **STIPULATION FOR RELEASE OF IRREVOCABLE TRUST PROCEEDS**

<input checked="" type="checkbox"/>	TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document was served by the court via NEF and hyperlink to the document. On <b>July 1, 2025</b> , I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below
<input type="checkbox"/>	(BY MAIL) I am readily familiar with the firm's practice of collection and processing correspondence for mailing. On _____, under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at San Francisco, California, in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.
<input checked="" type="checkbox"/>	(BY EMAIL) I caused to be served the above-described document by email to the parties indicated on the attached service list at the indicated email address.

I declare under penalty of perjury, under the laws of the State of California and the United States of America that the foregoing is true and correct.

Executed on July 1, 2025 at San Francisco California.

/s/ Oliver Carpio

Oliver Carpio

**TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):**

- David W. Baddley baddleyd@sec.gov
- Richard A. Chesley richard.chesley@dlapiper.com, bill.countryman@dlapiper.com
- Leslie A. Cohen leslie@lesliecohenlaw.com, jaime@lesliecohenlaw.com
- Jared A. Day jared.a.day@usdoj.gov
- Terri H. Didion terri.didion@usdoj.gov
- Kathryn S. Diemer kdiemer@diemerwei.com
- Darya Sara Druch ecf@daryalaw.com, Druch.DaryaR108463@notify.bestcase.com
- Cecily Ann Dumas cdumas@bakerlaw.com, hhammonturano@bakerlaw.com
- Michael P. Esser michael.esser@kirkland.com, michael-esser-3293@ecf.pacerpro.com
- Sydney E. Fairbairn S.E.Fairbairn@att.net, waqar@realestatelawpartners.com
- Arasto Farsad farsadecf@gmail.com, farsadecf@ecf.courtdrive.com
- Jonathan Feldman feldman@katiephang.com
- John D. Fiero jfiero@pszjlaw.com, ocarpio@pszjlaw.com
- Bryan T. Glover bryan.glover@stoel.com
- Eric D. Goldberg eric.goldberg@dlapiper.com, eric-goldberg-1103@ecf.pacerpro.com
- Jeffrey J. Goodrich goodrich4bk@gmail.com
- Mark A. Gorton mgorton@boutininc.com, cdomingo@boutinjones.com
- Debra I. Grassgreen dgrassgreen@pszjlaw.com, hphan@pszjlaw.com
- Tracy Green tgreen@fennemorelaw.com, courtfilings@fennemorelaw.com
- Mitchell B. Greenberg mgreenberg@abbeylaw.com, mmeroney@abbeylaw.com
- Thomas P. Griffin tgriffin@hsmlaw.com, lnewberry@hsmlaw.com
- Cameron M. Gulden cameron.m.gulden@usdoj.gov
- Jennifer C. Hayes jhayes@fhlawllp.com
- Ryan A. Henderson Ryan@welyweaver.com
- A. Kenneth Hennesay khennesay@allenmatkins.com, ncampos@allenmatkins.com
- Robbin L. Itkin ritkin@sklarkirsh.com, cbullock@sklarkirsh.com
- Ivan L. Kallick ikallick@manatt.com
- Ori Katz okatz@sheppardmullin.com, LSegura@sheppardmullin.com
- Ivo Keller ikeller@sflaw.com
- Thomas Philip Kelly tomkelly@sonic.net
- Jeannie Kim jekim@sheppardmullin.com, dgatmen@sheppardmullin.com
- Alexis T. King king.a@wssllp.com, gil-lopez.j@wssllp.com
- Matthew Ryan Klinger mklinger@sheppardmullin.com, DGatmen@sheppardmullin.com
- Julie Koenig julie.koenig@cooperscully.com
- Ian S. Landsberg ilandsberg@sklarkirsh.com
- Richard A. Lapping richard.lapping@gmail.com
- Adam A. Lewis alewis@mofo.com, adam-lewis-3473@ecf.pacerpro.com
- Mark A. Lightner MLightner@mofo.com
- Mitchell B Ludwig mbl@kpclegal.com
- Patricia H. Lyon phlyon@frenchlyontang.com, mwoodward@frenchandlyon.com
- J. Barrett Marum bmarum@sheppardmullin.com, egarcia@sheppardmullin.com
- K Keith McAllister kkmcallister@gmail.com, kkmECFactivity@gmail.com
- Kevin Scott McClelland kevin.mcclelland@kirkland.com
- Christopher M. McDermott ecfcab@aldridgepate.com, CMM@ecf.inforuptcy.com
- H. Mark Mersel mark.mersel@bclplaw.com, ginny.hamel@bclplaw.com
- Matthew D. Metzger belvederelegalecf@gmail.com, 8450177420@filings.docketbird.com
- Dennis D. Miller dmiller@lubinolson.com
- Kevin Harvey Morse kmorse@clarkhill.com, kwebster@clarkhill.com
- Thomas G. Mouzes tmouzes@boutinjones.com, cdomingo@boutinjones.com
- Office of the U.S. Trustee / SF USTPRegion17.SF.ECF@usdoj.gov
- Aron M. Oliner roliner@duanemorris.com, dmicros@duanemorris.com
- R. Gibson Pagter gibson@ppilawyers.com

- Joshua K. Partington jpartington@swlaw.com, mlinker@swlaw.com
- Eric S. Pezold epezold@swlaw.com, fcardenas@swlaw.com
- Marc L. Pinckney marcpinckney@gmail.com
- Douglas B. Provencher dbp@provlaw.com
- Debra A. Riley driley@allenmatkins.com, bcrfilings@allenmatkins.com
- Gregory A. Rougeau grougeau@brlawsf.com
- Cheryl C. Rouse rblaw@ix.netcom.com
- Spencer P. Scheer sscheer@scheerlawgroup.com
- Nathan A. Schultz nschultzesq@gmail.com, kjarashow@goodwinlaw.com
- Steven Serajeddini steven.serajeddini@kirkland.com
- Melinda Jane Steuer msteuer@californiainvestoradvocate.com
- Christopher D. Sullivan csullivan@sullivanblackburn.com, AJTorio@sullivanblackburn.com
- Michael A. Sweet msweet@foxrothschild.com, michael-sweet-6337@ecf.pacerpro.com
- Connie Tche connie@jenleelaw.com, jenlee@ecf.courtdrive.com
- John A. Vos invalidemailecfonly@gmail.com, Voslawoffice@jubileebk.net
- Thomas A. Woods thomas.woods@stoel.com, sheila.brown@stoel.com
- Bennett G. Young byoung@jmbm.com, jb8@jmbm.com
- David R. Zaro dzaro@allenmatkins.com, mdiaz@allenmatkins.com

**TO BE SERVED VIA EMAIL:**

David Taylor Keller, Benvenuti & Kim LLP Email: dtaylor@kbbkllp.com  <i>Attorneys for Charlene Albanese</i>	Alexis King Winget, Spadafora & Schwartzberg, LLP Email: king.a@wssllp.com  <i>Attorneys for Leslie Michelle Wallach</i>
Wendy Thomas Tadjedin Thomas & Engbloom Law Group Email: wendyt@ttelawgroup.com  <i>Attorneys for Manuel Romero</i>	